

EXHIBIT 12

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Hydraulic Control Interim Measures Implementation Report for

**Former Rhone-Poulenc/Seattle Plant
Tukwila, Washington**

Prepared by:



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***For
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were abandoned by Holt Drilling prior to installation of the barrier wall. Abandonment well logs are in Appendix F.

2.7.2 Pretreatment System

The pretreatment system was located on the inside south wall of the existing two-story warehouse. A 6-inch by 6-inch concrete curb was constructed around the pretreatment system for containment. A pipe support system was constructed on the east and north sides of the containment berm for system piping. The PLC, load center, extraction well pump controllers, and motor starters were placed on the south wall of the existing building. A surge tank, bag filter, and two GAC units were also installed per the original plans.

On July 28, 2003 a representative from the King County Industrial Waste Division was on-site for the system final inspection. The system was reviewed and approved for discharge to the Metro sewer. RCIE had previously received a major discharge authorization from King County.

Discharge to the Metro sewer began on August 4, 2003. As part of the Industrial Waste Division permit conditions, monitoring of the system began on August 8, 2003. Samples were taken of the influent between the GAC units, and of the effluent. The samples were taken to Analytical Resources Inc. in Tukwila for BTEX, FOG, and pH testing. The sampling and testing will continue on a weekly basis for one month, biweekly for one month, and then monthly during system operation, with quarterly reporting to the Industrial Waste Division.

During the transducer-monitoring program (Appendix G), groundwater was determined to be 3 to 4 feet above the final operating level for the system. The system will be run continuously until the level of the groundwater is within final operating limits. Once the groundwater level is lowered to operating limits, the system will be controlled by the head difference between the selected interior and exterior monitoring wells.

2.8 CONSTRUCTION WASTE MANAGEMENT

Construction waste was minimized at the site in part by the use of the vibrating beam technology. Minimal excavation was required for the slurry reservoir trench used during installation of the barrier wall. Additionally, excess slurry was minimized by batch mixing the slurry at the enclosed mixing plant.